



*Commonwealth of Virginia*

*VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY*

SOUTHWEST REGIONAL OFFICE  
355-A Deadmore Street, Abingdon, Virginia 24210  
(276) 676-4800 FAX (804) 698-4178  
[www.deq.virginia.gov](http://www.deq.virginia.gov)

Matthew J. Strickler  
Secretary of Natural and Historic Resources

David K. Paylor  
Director  
(804) 698-4000

Jeffrey Hurst  
Regional Director

July 13, 2021

Ms. Lydia Sinemus  
Corporate Director, HR & EHS  
Strongwell Corporation  
400 Commonwealth Avenue  
Bristol, Virginia 24201

Location: Bristol  
Registration No.: 10211

Dear Ms. Sinemus:

Attached is a renewal Title V permit to operate your facility pursuant to 9VAC5 Chapter 80 Article 1 of the Virginia Regulations for the Control and Abatement of Air Pollution. The attached permit will be in effect beginning September 27, 2021.

In the course of evaluating the application and arriving at a final decision to issue this permit, the Department of Environmental Quality (DEQ) deemed the application complete on February 5, 2021 and solicited written public comments by placing a newspaper advertisement in the *Bristol Herald Courier* on April 16, 2021. The thirty-day required comment period, provided for in 9VAC5-80-270 expired on May 17, 2021.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

This permit approval to operate shall not relieve Strongwell Corporation of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with

Ms. Lydia Sinemus

July 13, 2021

Page 2

the Board within 30 days after this case decision notice was mailed or delivered to you. Please consult the relevant regulations for additional requirements for such requests.

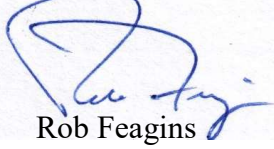
As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director  
Department of Environmental Quality  
P. O. Box 1105  
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact me at 276-676-4835.

Sincerely,



Rob Feagins  
Air Permit Manager

GRF/ecm/SWRO10211.docx

Attachment: Permit

cc: File



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Federal Operating Permit  
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9VAC5-80-50 through 9VAC5-80-300, of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: **Strongwell Corporation**  
Facility Name: **Strongwell – Bristol Facility**  
Facility Location: **400 Commonwealth Avenue**  
**Bristol, Virginia**

Registration Number: **10211**  
Permit Number: **SWRO - 10211**

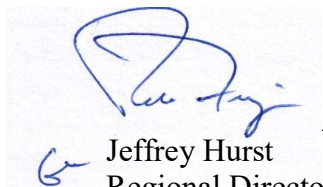
This permit includes the following programs:

Federally Enforceable Requirements - Clean Air Act

September 27, 2021  
Effective Date

September 26, 2026  
Expiration Date

Strongwell Corporation – Bristol Facility  
Permit Registration Number: SWRO-10211  
July 13, 2021  
Page 4



Jeffrey Hurst  
Regional Director

July 13, 2021  
Signature Date

Table of Contents, page 3  
Permit Conditions, pages 9 through 50

## Table of Contents

<b>Facility Information.....</b>	<b>5</b>
<b>Emission Units.....</b>	<b>6</b>
<b>Fuel Burning Equipment Requirements – B-1, B-2, B-3, WR-2 .....</b>	<b>10</b>
LIMITATIONS.....	10
MONITORING .....	11
RECORDKEEPING.....	12
TESTING .....	13
REPORTING .....	13
<b>Spray Coating Equipment Requirements - PB-1 and PB-2 .....</b>	<b>14</b>
LIMITATIONS.....	14
MONITORING .....	16
RECORDKEEPING.....	17
TESTING .....	19
<b>Pultrusion Equipment Requirements - PM-2, PM-4 – PM-8, PM-10 – PM-11, PM-13 – PM-16, PM-18 – PM-22, PM-24, PM-26 - PM-31, PM-35 – PM-37, PM-39, PM-40, PM-44, PM-46, PM-48, PM-50, PM-63, PM-90 .....</b>	<b>19</b>
LIMITATIONS.....	19
MONITORING .....	24
RECORDKEEPING.....	24
TESTING .....	26
REPORTING .....	26
<b>Molded Grating Requirements - (MG-1).....</b>	<b>27</b>
LIMITATIONS.....	27
RECORDKEEPING.....	27
TESTING .....	28
<b>Resin Mixing and Storage Equipment Requirements – Mix, T-1 – T-6, T-8 .....</b>	<b>28</b>
LIMITATIONS.....	28
RECORDKEEPING.....	29
TESTING .....	30
REPORTING .....	30
<b>Chromium Electroplating Equipment Requirements – CP-1, CP-2.....</b>	<b>31</b>
LIMITATIONS.....	31
MONITORING .....	32
RECORDKEEPING.....	33
TESTING .....	35
REPORTING .....	35
<b>Emergency Generator Requirements – EG-1 .....</b>	<b>37</b>
LIMITATIONS.....	37
MONITORING .....	39
RECORDKEEPING/REPORTING .....	39
TESTING .....	40
<b>Insignificant Emission Units .....</b>	<b>40</b>

<b>Permit Shield &amp; Inapplicable Requirements .....</b>	<b>40</b>
<b>General Conditions .....</b>	<b>42</b>

## Facility Information

Permittee  
Strongwell Corporation  
P. O. Box 580  
Bristol, Virginia 24203-0580

Responsible Official  
Lydia Sinemus  
Corporate Director, Human Resources and Environmental Health & Safety

Facility  
Strongwell – Bristol Facility  
400 Commonwealth Avenue  
Bristol, Virginia 24201

Contact Person  
Lydia Sinemus  
Corporate Director, Human Resources and Environmental Health & Safety  
276-645-8091

County-Plant Identification Number: 51-520-00018

**Facility Description:** NAICS 326199 – Strongwell Corporation manufactures fiberglass reinforced plastics at their Bristol Division facility using pultrusion and molding processes.

The pultrusion process involves drawing reinforced fibers through a liquid resin mixture. The saturated fibers are then pulled through forming guides and into a heated die. The resin chemically reacts in the die creating a solid, hard finished part as the material exits. The profile produced is then cut to length. Pultrusion resins have two basic components: base resin and monomers.

The molding process involves pouring a resin/fiberglass slurry into molds and curing.

The company utilizes boilers, a curing oven, and an emergency generator for process heat and power.

Volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions result from evaporation of monomers during both processes. Additional VOC and HAP emissions occur during spray painting of various plastic parts and bonding of metal fittings to fiberglass rods.

## Emission Units

Process Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description *	PCD ID	Pollutant Controlled	Applicable Permit Date
B-1	B-1	One Eclipse 200 hp natural gas/No.2 fuel oil-fired tube boiler	8.375 MMBtu/hr heat input	None	—	—	02/19/2020
B-2	B-2	One Cleaver Brooks 150 hp natural gas/No. 2 fuel oil-fired tube boiler, model CB-150p	6.277 MMBtu/hr heat input	None	—	—	02/19/2020
B-3	B-3	One Williams and Davis 200 hp natural gas/No. 2 oil-fired tube boiler, model 777	8.4 MMBtu/hr heat input	None	—	—	02/19/2020
WR-2	WR-2	Steelman Model 8820 gas-fired curing oven	0.84 MMBtu/hr heat input	None	—	—	02/19/2020
PB-1	PB-1	One 16' x 28' x 7' booth	6 lbs/hr	16' x 28' x 7' booth equipped with paper filters	PB-1	Particulate	02/19/2020
PB-2	PB-2	One PA ASCHE Airbrush Co., 16' x 24' x 9' paint spray booth	116 lbs/hr	PA ASCHE Airbrush Co., 16' x 24' x 9' spray filter booth equipped with paper filters	PB-2	Particulate	02/19/2020
PM-2, PM-4, and PM-5	DC-4	Strongwell, 4 cavity model, 3 machines	300 lbs/hr input, each	DC-4: Farr Tenkay 241S C74881-4-B, filtered dust collector	DC-4	Particulate	02/19/2020



<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Description</b>	<b>Size/Rated Capacity*</b>	<b>Pollution Control Device (PCD) Description *</b>	<b>PCD ID</b>	<b>Pollutant Controlled</b>	<b>Applicable Permit Date</b>
PM-6, PM-7, PM-8, PM-10, PM-11, PM-13, and PM-48	DC-3	Strongwell, 2 cavity model, 7 machines	150 lbs/hr input, each, except PM-13, which is 130 lbs/hr	DC-3: Farr Tenkay 40L C74122-3 7, filtered dust collector;	DC-3	Particulate	02/19/2020
PM-14, PM-15, PM-16, PM-18, PM-19, PM-20, PM21, PM-22	DC-3	Strongwell, single cavity 6 inch model, 8 machines	130 lbs/hr input, each	DC-3: Farr Tenkay 40L C74122-3 7, filtered dust collector	DC-3	Particulate	02/19/2020
PM-24	DC-3	Strongwell, single cavity 30 inch model, one machine	300 lbs/hr input	DC-3: Farr Tenkay 40L C74122-3 7, filtered dust collector	DC-3	Particulate	02/19/2020
PM-26	DC-3	Strongwell, single cavity, one machine	300 lbs/hr input	DC-3: Farr Tenkay 40L C74122-3 7, filtered dust collector	DC-3	Particulate	02/19/2020
PM-27	DC-4	PTI 3008 Pultrusion, one machines	300 lbs/hr input, each	DC-4: Farr Tenkay 241S C74881-4-B, filtered dust collector	DC-4	Particulate	02/19/2020
PM-28	DC-3	Pulstar 3008 pultrusion, one machine	300 lbs/hr input, each	DC-3: Farr Tenkay 40L C74122-3 7, filtered dust collector	DC-3	Particulate	02/19/2020
PM-29	DC-3	Strongwell, 3 cavity model, one machine	200 lbs/hr input	DC-3: Farr Tenkay 40L C74122-3 7, filtered dust collector	DC-3	Particulate	02/19/2020
PM-30	DC-11	Strongwell, single cavity 14 inch model, one machine	150 lbs/hr input, each	DC-11: Farr-Tenkay 116771001 filtered dust collector	DC-11	Particulate	02/19/2020

<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Description</b>	<b>Size/Rated Capacity*</b>	<b>Pollution Control Device (PCD) Description *</b>	<b>PCD ID</b>	<b>Pollutant Controlled</b>	<b>Applicable Permit Date</b>
PM-31	DC-4	Strongwell, single cavity 14 inch model, one machine	150 lbs/hr input, each	DC-4: Farr Tenkay 241S C74881-4-B, filtered dust collector	DC-4	Particulate	02/19/2020
PM-35 and PM-40	DC-2	Strongwell, single cavity 14 inch model, 2 machines	150 lbs/hr input, each	DC-2: Donaldson DF04-16 filtered dust collector	DC-2	Particulate	02/19/2020
PM-36	DC-1	Strongwell, 60 inch model, one machine	500 lbs/hr input	DC-1: Arrington-Curtis No.2, filtered dust collector	DC-1	Particulate	02/19/2020
PM-37 and PM-39	DC-1	Strongwell, single cavity 14 inch model, 2 machines	150 lbs/hr input, each	DC-1: Arrington-Curtis No.2, filtered dust collector	DC-1	Particulate	02/19/2020
PM-44	DC-2	Glastrusion recip. pultrusion, one machine	150 lbs/hr input, each	DC-2: Donaldson DF04-16 filtered dust collector	DC-2	Particulate	02/19/2020
PM-46	DC-10	Strongwell, single cavity model, one machine	500 lbs/hr input	DC-10: Donaldson-Torit filtered dust collector	DC-10	Particulate	02/19/2020
PM-50	DC-3	Strongwell, single cavity tube model, one machine	200 lbs/hr input	DC-3: Farr Tenkay 40L C74122-3 7, filtered dust collector	DC-3	Particulate	02/19/2020
PM-63	DC-9	Strongwell, Pulstar 4010, one machine	450 lbs/hr, input	DC-9: Camfill/Farr GS-2 filtered dust collector	DC-9	Particulate	02/19/2020
PM-90	DC-8	Strongwell, single cavity model, one machine	750 lbs/hr, input	DC-8: W.W. SYL Pactecon filtered dust collector	DC-8	Particulate	02/19/2020
MG-1	No stack	Various open molds for grating	108 ft <sup>2</sup> /hr	None	—	—	02/19/2020

<b>Emission Unit ID</b>	<b>Stack ID</b>	<b>Emission Unit Description</b>	<b>Size/Rated Capacity*</b>	<b>Pollution Control Device (PCD) Description *</b>	<b>PCD ID</b>	<b>Pollutant Controlled</b>	<b>Applicable Permit Date</b>
CP-1	CP-2	Rapid Electric Technologies D.C. Power, 3000 Amp, 2-12 V, 36 KW	8 lbs/hr	KCH Spectra 5/4000 composite mesh-pad system	CP-2	Hexavalent chromium	02/19/2020
Mix	No stack	Strongwell resin mixing room	5 tons/hr output	Enclosed mixing and material transfer system	—	VOC and HAP	02/19/2020
T-1 through T-6	No stack	6 Resin bulk storage tanks	6,768 gallons storage capacity, each	None	—	—	02/19/2020
T-8	No stack	Solvent bulk storage tank	2,401 gallons storage capacity	None	—	—	02/19/2020
EG-1	EG-1	Olympian diesel-fired emergency generator with a Perkins engine – 2004 with 147 gallon tank	61.9 bhp (40 kW)	None	—	—	—

\*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

## **Fuel Burning Equipment Requirements – B-1, B-2, B-3, WR-2**

### **Limitations**

1. Fuel Burning Equipment Requirements (B-1, B-2, B-3) - Emissions from each boiler shall be controlled by proper operation and maintenance in accordance with the manufacturer's recommendations at minimum. Boiler operators shall be trained in the proper operation of all such equipment. Training shall consist of a review and familiarization of the manufacturer's operating instructions, at minimum.  
(9VAC5-50-20 E and 9VAC5-80-110)
2. Fuel Burning Equipment Requirements (B-1, B-2, B-3) - The approved fuels for each fuel burning unit, B-1, B-2, and B-3, are natural gas and distillate oil. Distillate oil is defined as fuel oil that meets the specifications for fuel oil numbers 1 and 2 under the American Society for Testing and Materials, ASTM D396 "Standard Specification for Fuel Oils." A change in fuels may require a permit.  
(9VAC5-80-110)
3. Fuel Burning Equipment Requirements - Emissions from the operation of each boiler (B-1, B-2, B-3) shall not exceed the limits specified below:  

Particulate Matter	0.48 lbs/MMBtu
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(9VAC5-40-900 and 9VAC5-80-110)
4. Fuel Burning Equipment Requirements - Total sulfur dioxide emissions from the operation of the fuel burning installation, which includes B-1, B-2, and B-3, shall not exceed the limits specified below:  

Sulfur Dioxide	60.86 lbs/MMBtu
----------------	-----------------

  
(9VAC5-40-930 and 9VAC5-80-110)
5. Fuel Burning Equipment Requirements - Visible Emissions from each of the boiler (B1, B-2, and B-3) stacks shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.  
(9VAC5-80-110 and 9VAC5-50-80)
6. Fuel Burning Equipment Requirements - The boilers and process heater (B1, B-2, B-3, and WR-2) must comply with the applicable work practice standards identified in Table 3 of 40 CFR 63 Subpart DDDDD.  
(9VAC5-50-80, 9VAC5-80-110, and 40 CFR 63.7500(a) and (e))

## Monitoring

7. Fuel Burning Equipment Requirements - Boilers and process heaters (B1, B-2, B-3, and WR-2) in the units designed to burn gas 1 fuels subcategory with a heat input capacity of less than or equal to 5 million Btu per hour must complete a tune-up every 5 years as specified in 40 CFR 63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory with a heat input capacity greater than 5 million Btu per hour and less than 10 million Btu per hour must complete a tune-up every 2 years as specified in 40 CFR 63.7540. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 to 40 CFR 63, Subpart DDDDD, or the operating limits in Table 4, but must meet the work practice standards of Table 3. These standards apply at all times the affected unit is operating. (9VAC5-80-110 and 40 CFR 63.7500(e))
8. Fuel Burning Equipment Requirements (B1, B-2, and B-3) - Biennial tune-ups must be conducted within 25 months of the last tune-up. Tune-ups must be performed according to the procedure outlined in 40 CFR 63.7540(a)(10)(i) through (vi). If the unit is not operating on the date required for a tune-up, the tune-up must be conducted within 30 days of startup. (9VAC5-80-110, 40 CFR 63.7510(e), 40 CFR 63.7515(d), and 40 CFR 63.7540(a)(11) and (13))
9. Fuel Burning Equipment Requirements - The initial tune-up for the process heater (WR-2) must be performed within 61 months of initial startup. Subsequent 5-year tune-ups must be conducted within 61 months of the last tune-up. Tune-ups must be performed according to the procedure outlined in 40 CFR 63.7540(a)(10)(i) through (vi). If the unit is not operating on the date required for a tune-up, the tune-up must be conducted within 30 days of startup. (9VAC5-80-110, 40 CFR 63.7510(g), 40 CFR 63.7515(d), and 40 CFR 63.7540(a)(12) and (13))
10. Fuel Burning Equipment Requirements - Visible emission observations shall be performed on each boiler exhaust stack, B-1, B-2, and B-3, at least once each week during periods of normal unit operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed during these weekly observations, or at any other time, visible emissions evaluations in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If any of the observations exceed twenty percent (20%) opacity, the VEE shall be conducted for a total of sixty (60) minutes. A Method 9 evaluation shall not be required if the visible emissions condition is corrected as expeditiously as practicable such that no visible emissions are present; the emissions unit is operating at normal conditions; and the cause and corrective measures taken are recorded. A record of each visible emissions observation shall be maintained, including, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer. (9VAC5-50-20 and 9VAC5-80-110 K)

## Recordkeeping

11. Fuel Burning Equipment Requirements (B-1, B-2, and B-3) - The permittee shall obtain a certification from the fuel supplier with each shipment of distillate oil. Each fuel supplier certification shall include the following:
  - a. The name of the fuel supplier;
  - b. The date on which the oil was received;
  - c. The volume of distillate oil delivered in the shipment;
  - d. A statement that the oil complies with the American Society for Testing and Materials specifications for fuel oil numbers 1 and 2; and
  - e. The sulfur content of the oil.  
(9VAC5-80-110)
12. Fuel Burning Equipment Requirements - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Southwest Regional Office. These records shall include, but are not limited to:
  - a. Written operating procedures, maintenance schedules, and operational adjustments for each fuel burning unit, B-1, B-2, B-3, and WR-2 which can be used to determine emissions.
  - b. Initial and periodic operator training which shall include, at minimum: (i) the date and place of training and the names of the trainer and trainees, (ii) the type of training (initial, periodic, etc.), and (iii) a copy of the training material.
  - c. All fuel supplier certifications.
  - d. Visible emissions observations and evaluations.
  - e. Emission factors and equations used to calculate actual emission rates of particulate matter and sulfur dioxide.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent (5) years.  
(9VAC5-50-50 and 9VAC5-80-110)
13. Fuel Burning Equipment Requirements (B-1, B-2, B-3, and WR-2) - The permittee shall keep records of:

- a. All notifications and reports required by the terms of this permit.
- b. Hours per calendar year that alternative fuel is burned, and total hours per calendar year that each unit operated during periods of gas curtailment.
- c. Calendar date, time, occurrence and duration of each startup and shutdown.
- d. Types and amount of fuel used during each startup and shutdown.

These records shall be maintained and made available and accessible on-site for 5 years following the date of each occurrence.  
(9VAC5-80-110, 40 CFR 63.7555(a), (h) and 40 CFR 63.7560)

### **Testing**

- 14. Fuel Burning Equipment Requirements - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from DEQ, test ports shall be provided at the appropriate locations.  
(9VAC5-80-110 and 9VAC5-50-30)
- 15. Fuel Burning Equipment Requirements - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.  
(9VAC5-80-110)

### **Reporting**

- 16. Fuel Burning Equipment Requirements - The permittee shall submit to the Southwest Regional Office the following reports:
  - a. Notification of alternative fuel use for units B-1, B-2, B-3, and WR-2 within 48 hours of the declaration of each period of gas curtailment;
  - b. Compliance reports for units B-1, B-2, and B-3 on a biennial basis, and on a 5-year schedule for unit WR-2. The first compliance report for the boilers shall cover the period from January 31, 2016 through December 31, 2017, submitted by March 1, 2018. The first compliance report for oven WR-2 shall cover the period from startup through December 31, 2020 and be submitted by March 1, 2021. Subsequent compliance reports shall cover the period from January 1 through December 31 of the applicable 2-year or 5-year timeframe, submitted by March 1 following the reporting period. The compliance reports shall include:
    - i. Company and facility name and address;
    - ii. Process unit information;

- iii. Date of the report and beginning and ending dates of the reporting period;
- iv. The total operating time during the reporting period; and
- v. The dates of the most recent tune-up and burner inspection (if delayed) for each unit.

The compliance reports must be submitted electronically using EPA's Compliance and Emissions Data Reporting Interface (CEDRI) accessed through EPA's Central Data Exchange (CDX) at [cdx.epa.gov](http://cdx.epa.gov).  
(9VAC5-80-110, 40 CFR 63.7540(b), 40 CFR 63.7545(f), 40 CFR 63.7550(a) through (c) and (h))

## **Spray Coating Equipment Requirements - PB-1 and PB-2**

### **Limitations**

- 17. Spray Coating Equipment Requirements – Particulate emissions from each spray booth, PB-1, and PB-2, shall be controlled by paper filters or equivalent. Each spray booth shall be provided with adequate access for inspection.  
(9VAC5-80-110 and Condition 1 of the 02/19/20 permit)
- 18. Spray Coating Equipment Requirements - Total throughput of coatings to spray booth PB-2 shall not exceed 116 pounds per hour and 25 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.  
(9VAC5-80-110, 9VAC5-80-1180, and Condition 10 of 02/19/20 permit)
- 19. Spray Coating Equipment Requirements - The permittee shall operate the spray coating equipment, PB-2, in compliance with all applicable emissions standards for existing general use coating sources in the National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products, 40 CFR Part 63, Subpart PPPP, 40 CFR 63.4480 through 40 CFR 63.4581, and 40 CFR Part 63, Subpart A, General Provisions as identified by Table 2 of Subpart PPPP.  
(9VAC5-80-110, 9VAC 60-100 Subparts A and PPPP, 40 CFR 63.1 and 40 CFR 63.4481)
- 20. Spray Coating Equipment Requirements - The VOC content of any coating delivered to spray booth PB-2 shall not exceed 60 percent by weight.  
(9VAC5-80-110, 9VAC5-80-1180, 9VAC5-50-260 and Condition 11 of 02/19/20 permit)



21. Spray Coating Equipment Requirements - The solids content of any coating delivered to spray booth PB-2 shall not exceed 88 percent by weight.  
(9VAC5-80-110, 9VAC5-80-1180, 9VAC5-50-260 and Condition 12 of 02/19/20 permit)
22. Spray Coating Equipment Requirements - Visible emissions from the each spray booth process shall not exceed five percent (5%) opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.  
(9VAC5-80-110 9VAC5-80-1180, 9VAC5-50-260, and Condition 16 of 02/19/20 permit)
23. Spray Coating Equipment Requirements - Emissions from the operation of spray booth PB-2 shall not exceed the limits specified below:

Volatile Organic Compounds	69.6 lbs/hr	15.0 tons/yr
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These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 17, 18, 19, 20, 21, and 22.  
(9VAC5-80-110, 9VAC5-80-1180, 9VAC5-50-260 and Condition 13 of 02/19/20 permit)

24. Spray Coating Equipment Requirements - Emissions of organic hazardous air pollutants (HAP) from spray booth PB-2 shall not exceed 0.16 pound of organic HAP emitted per pound of coating solids used, calculated monthly as the sum of each consecutive 12-month period. This condition applies at all times.  
(9VAC5-80-110, 9VAC5-60-100 Subpart PPPP, 40 CFR 63.4490(b)(1) and 40 CFR 63.4500(a)(1))
25. Spray Coating Equipment Requirements - The permittee shall use at least one of the following options to comply with the emission limit in Condition 24 of this permit:
  - a. Compliant Material option: The organic HAP content of each coating used in the coating operation(s) shall be less than or equal to 0.16 pound of organic HAP per pound of coating solids, and each thinner and/or other additive, and cleaning material used shall contain no organic HAP.
  - b. Emission Rate Without Add-On Controls option: Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to 0.16 pound of organic HAP per pound of coating solids, calculated monthly as the sum of each consecutive 12-month period.

Either of the compliance options may be applied to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. Different compliance options may be used for different coating operations, or at different times on

the same coating operation. Different compliance options may be used when different coatings are applied to the same part, or when the same coating is applied to different parts. However, different compliance options may not be used at the same time on the same coating operation.

(9VAC5-80-110, 9VAC5-60-100 Subpart PPPP, and 40 CFR 63.4491(a) and (b))

## Monitoring

26. Spray Coating Equipment Requirements - Visible emissions observations shall be performed on each spray booth exhaust (PB-1 and PB-2), at least once each day during periods of normal unit operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed during these daily observations, or at any other time, visible emissions evaluations in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If any of the observations exceed five percent (5%), the VEE shall be conducted for a total of sixty (60) minutes. A Method 9 evaluation shall not be required if the visible emissions condition is corrected as expeditiously as practicable such that no visible emissions are present; the emissions unit is operating at normal conditions; and the cause and corrective measures taken are recorded. A record of each visible emissions observation shall be maintained, including, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.

(9VAC5-80-110, 9VAC5-50-20, and 9VAC5-80-110 K)

27. Spray Coating Equipment Requirements - For each compliance period to demonstrate compliance with the Compliant Material option, the permittee shall:
- Determine the mass fraction of organic HAP for each material using 40 CFR 63, Appendix A, Method 311, 40 CFR 60, Appendix A, Method 24, information from the material supplier or manufacturer, or an alternative method approved by the Administrator. The mass fraction of organic HAP for solvent blends shall be determined in accordance with 40 CFR 63.4541(a)(5).
  - Determine the mass fraction of coating solids for each coating using 40 CFR 60, Appendix A, Method 24, information from the material supplier or manufacturer, or an alternative method approved by the Administrator.
  - Calculate the organic HAP content of each coating by dividing the mass fraction of organic HAP in the coating by the mass fraction of coating solids.

A compliance period consists of 12 months. Each month is the end of a compliance period consisting of that month and the preceding 11 months.

(9VAC5-80-110, 9VAC5-60-100 Subpart PPPP and 40 CFR 63.4542)

28. Spray Coating Equipment Requirements - For each compliance period to demonstrate compliance with the Emission Rate Without Add-On Controls option, the permittee shall:
- a. Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in Condition 27.a of this permit.
  - b. Determine the mass fraction of coating solids for each coating used during each month according to the requirements in Condition 27.b of this permit.
  - c. Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98, Standard Test Method for Density of Liquid Coatings, Inks, and Related Products, supplier or manufacturer information, or reference sources providing density or specific gravity data for pure materials.
  - d. Determine the volume of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records.
  - e. Calculate the mass of organic HAP emissions in accordance with 40 CFR 63.4551(e). The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials.
  - f. Calculate the total mass of coating solids used in accordance with 40 CFR 63.4551(f). The total mass of coating solids used is the combined mass of coating solids for all coatings used during each month.
  - g. Calculate the organic HAP emission rate for the compliance period in accordance with 40 CFR 63.4551(g). When calculating the organic HAP emission rate, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which the Compliant Material option was used.

A compliance period consists of 12 months. Each month is the end of a compliance period consisting of that month and the preceding 11 months. All calculations shall be conducted monthly using data from the previous 12 months of operation.

(9VAC5-80-110, 9VAC5-60-100 Subpart PPPP, 40 CFR 63.4551 and 40 CFR 63.4552)

### **Recordkeeping**

29. Spray Coating Equipment Requirements - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Southwest Regional Office. These records shall include, but are not limited to:

- a. Visible emissions observations and evaluations.
- b. Operating procedures, scheduled and unscheduled maintenance of all air pollution control equipment based on the manufacturer's recommendations, at minimum.
- c. Monthly and annual hours of operation of spray booth PB-2. Annual hours of operation shall be calculated monthly as the sum of each consecutive 12-month period.
- d. Hourly, monthly and annual throughput of each coating, thinner and/or other additive, and cleaning material through spray booth PB-2. Hourly throughput shall be calculated by dividing monthly throughput of each material to spray booth PB-2 by monthly hours of operation of spray booth PB-2. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period.
- e. Annual emissions of volatile organic compounds (VOC) from spray booth PB-2. Annual emissions shall be calculated and recorded monthly as the sum of each consecutive 12-month period.
- f. MSDS or other equivalent vendor data showing water content, solids content, and density for each material used in coating and cleaning operations.
- g. VOC content of each material used in coating and cleaning operations. For the purpose of calculating VOC emissions, the VOC content of each material as supplied, shall be based on formulation data as shown on its MSDS. If VOC content is given as a range, the maximum value shall be used.
- h. The compliance option used on each coating operation and the beginning and ending dates and times of each compliance option.
- i. For the Compliant Material option, calculations of the organic HAP content for each coating.
- j. For the Emission Rate Without Add-On Controls option, calculations of the total mass of organic HAP emissions from the coatings, thinners and/or other additives, and cleaning materials used each month, total mass of coating solids used each month and the organic HAP emission rate. The organic HAP emission rate shall be calculated monthly using data from the previous 12-months of operation.
- k. The mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used.
- l. The mass fraction of coating solids for each coating used.
- m. The date, time, and duration of each deviation, as defined in 40 CFR 63.4542 and 40 CFR 63.4552, from the organic HAP emission limitation.

- n. A copy of each notification and report submitted to comply with 40 CFR Part 63 Subpart PPPP.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-50-50, 9VAC5-80-110, 9VAC5-60-100 Subpart PPPP, 40 CFR 63.4530, 40 CFR 63.4531, and Conditions 18 and 23 of 02/19/20 permit)

### **Testing**

30. Spray Coating Equipment Requirements - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the DEQ, test ports shall be provided at the appropriate locations.  
(9VAC5-80-110, 9VAC5-50-30, and Condition 4 of 02/19/20 permit)
31. Spray Coating Equipment Requirements - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.  
(9VAC5-80-110)

### **Pultrusion Equipment Requirements - PM-2, PM-4 – PM-8, PM-10 – PM-11, PM-13 – PM-16, PM-18 – PM-22, PM-24, PM-26 - PM-31, PM-35 – PM-37, PM-39, PM-40, PM-44, PM-46, PM-48, PM-50, PM-63, PM-90**

### **Limitations**

32. Pultrusion Equipment Requirements – The permittee shall operate the pultrusion equipment in compliance with all applicable emission standards for an existing reinforced plastic composites production facility with no centrifugal casting or continuous lamination/casting operations in the National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5780 through 40 CFR 63.5935, and 40 CFR Part 63, Subpart A, General Provisions as identified by Table 15 of Subpart WWWW.  
(9VAC5-80-110, 9VAC5-60-100 Subparts A and WWWW, 40 CFR 63.1 and 40 CFR 63.5785)
33. Pultrusion Equipment Requirements - The pultrusion units shall be labeled with their appropriate reference numbers such that labels are readily visible.  
(9VAC5-80-110 and Condition 3 of the 02/19/20 permit)

34. Pultrusion Equipment Requirements - Particulate emissions from cutting operations associated with the pultrusion equipment shall be controlled by fabric filtration. The fabric filters shall be provided with adequate access for inspection.  
(9VAC5-80-110 and Condition 2 of the 02/19/20 permit)
35. Pultrusion Equipment Requirements - Throughput of styrene resin mix to the pultrusion equipment shall not exceed 3,600 pounds per hour and 7,560 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.  
(9VAC5-80-110 and Condition 7 of the 02/19/20 permit)
36. Pultrusion Equipment Requirements - Throughput of methyl methacrylate resin mix to the pultrusion equipment shall not exceed 300 pounds per hour and 720 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.  
(9VAC5-80-110 and Condition 8 of the 02/19/20 permit)
37. Pultrusion Equipment Requirements - Throughput of TYBON 289D17 or equivalent phenolic resin mix to the pultrusion equipment shall not exceed 312 pounds per hour and 750 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.  
(9VAC5-80-110 and Condition 9 of the 02/19/20 permit)
38. Pultrusion Equipment Requirements - Emissions from the operation of all the facility's pultrusion equipment shall not exceed the limits specified below:
- |                            |              |               |
|----------------------------|--------------|---------------|
| Volatile Organic Compounds | 43.32 lbs/hr | 92.87 tons/yr |
|----------------------------|--------------|---------------|
- Annual emissions shall be calculated as the sum of each consecutive 12-month period.  
(9VAC5-50-260, 9VAC5-80-110 and Condition 15 of the 02/19/20 permit)
39. Pultrusion Equipment Requirements - Emissions of total organic HAP from pultrusion operations producing plastic composites using styrene-containing resin shall be reduced by at least 60 weight percent. This condition applies at all times.  
(9VAC5-80-110, 9VAC 6-60-100, Subpart WWWW, 40 CFR 63.5805(b) and 40 CFR 63.5835(a))
40. Pultrusion Equipment Requirements - The permittee shall use one or more of the following control options to comply with the emissions reduction requirement in Condition 39 of this permit:

- a. Design, install, and operate wet area enclosures and resin drip collection systems on pultrusion machines that meet the following criteria:
  - i. The enclosure must cover and enclose the open resin bath and the forming area in which reinforcements are pre-wet or wet-out and moving toward the die(s). The surfaces of the enclosure must be closed except for openings to allow material to enter and exit the enclosure.
  - ii. For open bath pultrusion machines with a radio frequency pre-heat unit, the enclosure must extend from the beginning of the resin bath to within 12.5 inches or less of the entrance of the radio frequency pre-heat unit. If the stock that is within 12.5 inches or less of the entrance to the radio frequency pre-heat unit has any drip, it must be enclosed. The stock exiting the radio frequency pre-heat unit is not required to be in an enclosure if the stock has no drip between the exit of the radio frequency pre-heat unit to within 0.5 inches of the entrance of the die.
  - iii. For open bath pultrusion machines without a radio frequency pre-heat unit, the enclosure must extend from the beginning of the resin bath to within 0.5 inches or less of the die entrance.
  - iv. For pultrusion lines with pre-wet area(s) prior to direct die injection, no more than 12.5 inches of open wet stock is permitted between the entrance of the first pre-wet area and the entrance to the die. If the pre-wet stock has any drip, it must be enclosed.
  - v. The total open area of the enclosure must not exceed two times the cross sectional area of the puller window(s) and must comply with the following requirements:
    - (1) All areas that are open need to be included in the total open area calculation with the exception of access panels, doors, and/or hatches that are part of the enclosure.
    - (2) The area that is displaced by entering reinforcement or exiting product is considered open.
    - (3) Areas that are covered by brush covers are considered closed.
  - vi. Open areas for level control devices, monitoring devices, agitation shafts, and fill hoses must have no more than 1.0 inch clearance.
  - vii. The access panels, doors, and/or hatches that are part of the enclosure must close tightly. Damaged access panels, doors, and/or hatches that do not close tightly must be replaced.

- viii. The enclosure may not be removed from the pultrusion line, and access panels, doors, and/or hatches that are part of the enclosure must remain closed whenever resin is in the bath, except for the time period discussed in paragraph (9) below.
  - ix. The maximum length of time the enclosure may be removed from the pultrusion line or the access panels, doors, and/or hatches and may be open, is 30 minutes per 8 hour shift, 45 minutes per 12 hour shift, or 90 minutes per day if the machine is operated for 24 hours in a day. The time restrictions do not apply if the open doors or panels do not cause the limit of two times the puller window area to be exceeded. Facilities may average the times that access panels, doors, and/or hatches are open across all operating lines. In that case the average must not exceed the times shown in this paragraph. All lines included in the average must have operated the entire time period being averaged.
  - x. No fans, blowers, and/or air lines may be allowed within the enclosure. The enclosure must not be ventilated.
- b. Use direct die injection pultrusion machines with resin drip collection systems that meet all the following criteria:
- i. All the resin that is applied to the reinforcement is delivered directly to the die.
  - ii. No exposed resin is present, except at the face of the die.
  - iii. Resin drip is captured in a closed system and recycled back to the process.
- c. Use a preform injection system where liquid resin is injected to saturate reinforcements in an enclosed system containing one or more chambers with openings only large enough to admit reinforcements. Resin, which drips out of the chamber(s) during the process, shall be collected in closed piping or covered troughs and then into a covered reservoir for recycle. Resin storage vessels, reservoirs, transfer systems, and collection systems shall be covered or shielded from ambient air.
- d. Any combination of options in paragraphs a through c of this condition in which different pultrusion lines comply with different options described in paragraphs a through c of this condition, and:
- i. Each individual pultrusion machine meets the 60 percent reduction requirement, or
  - ii. The weighted average reduction based on resin throughput of all machines combined is 60 percent. For purposes of the average percent reduction calculation, wet area enclosures reduce organic HAP emissions by 60 percent,



and direct die injection and preform injection reduce organic HAP emissions by 90 percent.

(9VAC5-80-110, 9VAC5-60-100 Subpart WWWW and 40 CFR 63.5830(b) – (e))

41. Pultrusion Equipment Requirements - For pultrusion equipment manufacturing parts using styrene-containing resin with 1,000 or more reinforcements or the glass equivalent of 1,000 ends of 113 yield roving or more; and having a cross sectional area of 60 square inches or more, the permittee shall at all times:
- a. Not allow vents from the building ventilation system, or local or portable fans to blow directly on or across the wet-out area(s),
  - b. Not permit point suction of ambient air in the wet-out area(s) unless that air is directed to a control device,
  - c. Use devices such as deflectors, baffles, and curtains when practical to reduce air flow velocity across the wet-out area(s),
  - d. Direct any compressed air exhausts away from resin and wet-out area(s),
  - e. Convey resin collected from drip-off pans or other devices to reservoirs, tanks, or sumps via covered troughs, pipes, or other covered conveyance that shields the resin from the ambient air,
  - f. Cover all reservoirs, tanks, sumps, or HAP-containing materials storage vessels except when they are being charged or filled, and
  - g. Cover or shield from ambient air resin delivery systems to the wet-out area(s) from reservoirs, tanks, or sumps where practical.
- (9VAC5-80-110, 9VAC5-60-100 Subpart WWWW, 40 CFR 63.5805(b) and 40 CFR 63.5835(a))
42. Pultrusion Equipment Requirements - For cleaning operations for reinforced plastic composites production equipment subject to 40 CFR Part 63, Subpart WWWW, cleaning solvents that contain HAP shall not be used, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. The requirements of this condition do not apply to mold sealing and release agents or to mold stripping and cleaning. This condition applies at all times.  
(9VAC5-80-110, 9VAC5-60-100 Subpart WWWW, 40 CFR 63.5790(c), 40 CFR 63.5805(b) and 40 CFR 63.5835(a))
43. Pultrusion Equipment Requirements - Visible emissions from the fabric filter exhausts shall not exceed 5% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix

A). This condition applies at all times except during startup, shutdown and malfunction.  
(9VAC5-50-80, 9VAC5-80-110 and Condition 17 of the 02/19/20 permit)

## **Monitoring**

44. Pultrusion Equipment Requirements - For cleaning operations for reinforced plastic composites production equipment subject to 40 CFR Part 63, Subpart WWWW, cleaning solvents that contain HAP shall not be used, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. The requirements of this condition do not apply to mold sealing and release agents or to mold stripping and cleaning. This condition applies at all times.  
(9VAC5-80-110, 9VAC5-60-100 Subpart WWWW, 40 CFR 63.5790(c), 40 CFR 63.5805(b) and 40 CFR 63.5835(a))
45. Pultrusion Equipment Requirements - Visible emissions observations shall be performed on each fabric filter exhaust, at least once each day during periods of normal unit operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed during these daily observations, or at any other time, visible emissions evaluations in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted on those units with visible emissions. The VEE shall be conducted for a minimum of six (6) minutes. If any of the observations exceed five percent (5%), the VEE shall be conducted for a total of sixty (60) minutes. A Method 9 evaluation shall not be required if the visible emissions condition is corrected as expeditiously as practicable such that no visible emissions are present; the emissions unit is operating at normal conditions; and the cause and corrective measures taken are recorded. A record of each visible emissions observation shall be maintained, including, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.  
(9VAC5-50-20 and 9VAC5-80-110 K)
46. Pultrusion Equipment Requirements - Emissions from the operation and cleanup of the pultrusion equipment shall be calculated using DEQ approved emission factors.  
(9VAC5-50-50 and 9VAC5-80-110)
47. Pultrusion Equipment Requirements - The permittee shall calculate the organic HAP emissions from the pultrusion equipment monthly as the sum of each consecutive 12-month period, which demonstrates compliance with the organic HAP reduction requirement in Condition 39 of this permit.  
(9VAC5-80-110, 9VAC5-60-100 Subpart WWWW and 40 CFR 63.5900(a)(2))

## **Recordkeeping**

48. Pultrusion Equipment Requirements - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The

content and format of such records shall be arranged with the Southwest Regional Office. These records shall include, but are not limited to:

- a. Visible emissions observations and evaluations.
- b. Operating procedures, scheduled and unscheduled maintenance of all air pollution control equipment based on the manufacturer's recommendations, at minimum.
- c. All data, assumptions, and calculations used to determine organic HAP emissions factors for pultrusion equipment.
- d. A log containing each pultrusion unit and corresponding unit reference number.
- e. All times that doors or covers of wet area enclosures are open and there is resin present in the resin bath.
- f. A copy of each notification and report submitted to comply with this permit or any applicable requirement.
- g. A certified statement of compliance with the work practice requirements in Condition 41 of this permit.
- h. Monthly and annual hours of operation of the pultrusion equipment. Annual hours of operation shall be calculated monthly as the sum of each consecutive 12-month period.
- i. Monthly and annual throughput of each type resin mix to the pultrusion equipment. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period.
- j. Organic HAP content of each resin.
- k. Hourly throughput of each type resin mix to the pultrusion equipment. Hourly throughput of each resin mix shall be calculated by dividing monthly throughput of each resin mix by monthly hours of operation of the pultrusion equipment.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-50-50, 9VAC5-80-110, 9VAC5-60-100 Subpart WWW, 40 CFR 63.5895(c) and (e), 40 CFR 63.5915, 40 CFR 63.5920 and Conditions 18 and 23 of the 02/19/20 permit)

## Testing

49. Pultrusion Equipment Requirements - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the DEQ, test ports shall be provided at the appropriate locations.  
(9VAC5-50-30, 9VAC5-80-110, and Condition 4 of 02/19/20 permit)
50. Pultrusion Equipment Requirements - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.  
(9VAC5-80-110)

## Reporting

51. Pultrusion Equipment Requirements - The permittee shall submit to the Southwest Regional Office, semiannual compliance reports in accordance with 40 CFR 63.5910. Reports covering the periods from January 1 through June 30 should be postmarked or delivered by September 1 following the reporting period. Reports covering the periods from July 1 through December 31 should be postmarked or delivered by March 1 following the reporting period. Each report shall include, at a minimum:
  - a. Company name and address.
  - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - c. Date of the report and beginning and ending dates of the reporting period.
  - d. If there are no deviations from any applicable organic HAP emissions limitations, and there are no deviations from the requirements for work practice standards, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
  - e. For each deviation from an organic HAP emission limitation or work practice standard, the report must contain the total operating time of each affected source during the reporting period and information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

The semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report required in General Condition 97 of this permit if the compliance report is submitted along with, or as part of, the semiannual monitoring report and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit), or work practice requirement in 40 CFR Part 63, Subpart WWW. However, submission of

a semiannual compliance report shall not otherwise affect any obligation to report deviations from requirements of this permit.

The compliance reports must be submitted electronically using EPA's Compliance and Emissions Data Reporting Interface (CEDRI) accessed through EPA's Central Data Exchange (CDX) at [cdx.epa.gov](http://cdx.epa.gov).  
(9VAC5-80-110, 9VAC5-60-100 Subpart WWW and 40 CFR 63.5910)

## **Molded Grating Requirements - (MG-1)**

### **Limitations**

52. Molded Grating Equipment Requirements – The total annual throughput of polyester resin or methyl methacrylate resin to the molded grating process, MG-1, shall not exceed 608.18 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.  
(9VAC5-80-110, 9VAC5-80-1180 and Condition 5 of 02/19/20 permit)
53. Molded Grating Equipment Requirements - Annual throughput of styrene monomer to the fiberglass grating production equipment shall not exceed 79.65 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.  
(9VAC5-80-110, 9VAC5-80-1180 and Condition 6 of 02/19/20 permit)
54. Molded Grating Equipment Requirements - Emissions from the operation of the fiberglass grating production equipment shall not exceed the limits specified below:

Volatile Organic Compounds	8.47 lbs/hr	25.45 tons/yr
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These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 52 and 53.  
(9VAC5-80-110, 9VAC5-50-260 and Condition 14 of 02/19/20 permit)

### **Recordkeeping**

55. Molded Grating Equipment Requirements - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Southwest Regional Office. These records shall include, but are not limited to:

- a. Monthly and annual hours of operation of the molded grating process. Annual hours of operation shall be calculated monthly as the sum of each consecutive 12-month period.
- b. Annual throughput of each type resin mix to the molded grating process, calculated monthly as the sum of each consecutive 12-month period.
- c. Annual throughput of styrene monomer to the molded grating process, calculated monthly as the sum of each consecutive 12-month period.
- d. The permittee shall maintain records of emission factors used to calculate emissions from the molded grating process.
- e. A copy of each notification and report submitted to comply with this permit or any applicable requirement.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-80-1180, 9VAC5-50-50, 9VAC5-80-110 and Condition 18 of 02/19/20 permit)

### **Testing**

56. Molded Grating Equipment Requirements - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the DEQ, test ports shall be provided at the appropriate locations.  
(9VAC5-50-30, 9VAC5-80-110 and Condition 4 of 02/19/20 permit)
57. Molded Grating Equipment Requirements - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.  
(9VAC5-80-110)

### **Resin Mixing and Storage Equipment Requirements – Mix, T-1 – T-6, T-8**

#### **Limitations**

58. Resin Mixing and Storage Equipment Requirements – The permittee shall operate the resin mixing equipment, Mix, and the storage equipment, T-1 through T-6, and T-8, in compliance with all applicable emission standards for an existing reinforced plastic composites production facility with no centrifugal casting or continuous lamination/casting operations in the National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR Part 63, Subpart WWWW, 40 CFR 63.5780

through 40 CFR 63.5935, and 40 CFR Part 63, Subpart A, General Provisions as identified by Table 15 of Subpart WWW.

(9VAC5-80-110, 9VAC5-60-100 Subparts A and WWW, 40 CFR 63.1 and 40 CFR 63.5785)

59. Resin Mixing and Storage Equipment Requirements - The permittee shall comply at all times with the following work practice standards for mixing and storing styrene-containing resins:
- a. Use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
  - b. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
  - c. Keep mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.
  - d. Containers that store HAP-containing materials shall be kept closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
- (9VAC5-80-110, 9VAC5-60-100 Subpart WWW, 40 CFR 63.5805(b) and 40 CFR 63.5835(a))
60. Resin Mixing and Storage Equipment Requirements - For cleaning operations for reinforced plastic composites production equipment subject to 40 CFR Part 63, Subpart WWW, cleaning solvents that contain HAP shall not be used, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. The requirements of this condition do not apply to mold sealing and release agents or to mold stripping and cleaning. This condition applies at all times.
- (9VAC5-80-110, 9VAC5-60-100 Subpart WWW, 40 CFR 63.5790(c), 40 CFR 63.5805(b) and 40 CFR 63.5835(a))

### **Recordkeeping**

61. Resin Mixing and Storage Equipment Requirements - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Southwest Regional Office. These records shall include, but are not limited to:
- a. A certified statement of compliance with the work practice requirements in Condition 59 of this permit.

- b. A copy of each notification and report submitted to comply with this permit or any applicable requirement.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-50-50, 9VAC5-80-110, 9VAC5-60-100 Subpart WWWW, 40 CFR 63.5915 and 40 CFR 63.5920)

### **Testing**

- 62. Resin Mixing and Storage Equipment Requirements - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the DEQ, test ports shall be provided at the appropriate locations. (9VAC5-50-30, 9VAC5-80-110, and Condition 4 of 02/19/20 permit)
- 63. Resin Mixing and Storage Equipment Requirements - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ. (9VAC5-80-110)

### **Reporting**

- 64. The permittee shall submit to the Southwest Regional Office, semiannual compliance reports in accordance with 40 CFR 63.5910. Reports covering the periods from January 1 through June 30 should be postmarked or delivered by September 1 following the reporting period. Reports covering the periods from July 1 through December 30 should be postmarked or delivered by March 1 following the reporting period. Each report shall include, at a minimum:
  - a. Company name and address.
  - b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
  - c. Date of the report and beginning and ending dates of the reporting period.
  - d. If there are no deviations from any applicable organic HAP emissions limitations, and there are no deviations from the requirements for work practice standards, a statement that there were no deviations from the organic HAP emissions limitations or work practice standards during the reporting period.
  - e. For each deviation from an organic HAP emission limitation or work practice standard, the report must contain the total operating time of each affected source during the reporting period and information on the number, duration, and cause of



deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.

The semiannual compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report required in General Condition 97 of this permit if the compliance report is submitted along with, or as part of, the semiannual monitoring report and the compliance report includes all required information concerning deviations from any organic HAP emissions limitation (including any operating limit) or work practice requirement in 40 CFR Part 63, Subpart WWWW. However, submission of a semiannual compliance report shall not otherwise affect any obligation to report deviations from requirements of this permit.

Copies of semiannual compliance reports must be submitted to EPA electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) accessed through EPA's Central Data Exchange (CDX) at [cdx.epa.gov](http://cdx.epa.gov).  
(9VAC5-80-110, 9VAC5-60-100 Subpart WWWW and 40 CFR 63.5910)

## **Chromium Electroplating Equipment Requirements – CP-1, CP-2**

### **Limitations**

65. Chromium Electroplating Equipment Requirements – The permittee shall operate the chromium electroplating process, CP-1, in compliance with all applicable emission standards for a small, existing source in the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 CFR Part 63, Subpart N, 40 CFR 63.340 through 40 CFR 63.347, and 40 CFR Part 63, Subpart A, General Provisions as identified by Table 1 of Subpart N.  
(9VAC5-60-100 Subparts A and N, 40 CFR 63.1 and 40 CFR 63.340)
66. Chromium Electroplating Equipment Requirements - The permittee shall, at all times, including periods of startup, shutdown, and malfunction, operate and maintain the chromium electroplating process, CP-1, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices.  
(9VAC5-60-100 Subpart N and 40 CFR 63.342(f)(1)(i))
67. Chromium Electroplating Equipment Requirements - Malfunctions shall be corrected as soon as practicable after their occurrence.  
(9VAC5-60-100 Subpart N and 40 CFR 342(f)(1)(ii))
68. Chromium Electroplating Equipment Requirements - The permittee shall prepare an operation and maintenance plan for the chromium electroplating process, CP-1, which shall include the following elements, at a minimum:

- a. Operation and maintenance criteria for the affected source, the add-on air pollution control device and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment;
- b. Operation and maintenance practices for the add-on air pollution control device or monitoring equipment used to comply with subpart N as identified in Table 1 of 40 CFR 63.342;
- c. Procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur;
- d. A systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions; and
- e. Housekeeping procedures as specified in 40 CFR 63.342 Table 2.

The operation and maintenance plan entitled, "Strongwell Corporation-Bristol Division Operation and Maintenance Plan," received on May 31, 2016, is incorporated here by reference.

(9VAC5-60-100 Subpart N, 40 CFR 63.342(f)(3)(i), and 40 CFR 63.343(a)(8))

69. Chromium Electroplating Equipment Requirements - Emissions from the operation of the chromium electroplating process, CP-1, shall not exceed the limits specified below:

Total chromium	0.015 mg/dscm
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mg/dscm = milligrams per dry standard cubic meter of exhaust air

(9VAC5-50-260, 9VAC5-60-100 Subpart N and 40 CFR 63.342(c)(1)(ii))

70. Chromium Electroplating Equipment Requirements - The composite mesh-pad system, CP-2, shall be operated such that the pressure drop across the system equals 2.8 inches of water column  $\pm$  2 inches of water column.  
(9VAC5-60-100 Subpart N and 40 CFR 63.343(c)(1)(i))
71. Chromium Electroplating Equipment Requirements - Visible emissions from the chromium electroplating process exhaust, CP-1, shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity.  
(9VAC5-50-80 and 9VAC5-80-110)

## Monitoring

72. Chromium Electroplating Equipment Requirements - The permittee shall conduct monitoring of work practice standards as follows:

- a. Visually inspect, once per calendar quarter, the air pollution control device, CP-2, to ensure there is proper drainage, no chromic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device.
  - b. Visually inspect, once per calendar quarter, the back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist.
  - c. Visually inspect, once per calendar quarter, ductwork from the tank to the control device to ensure there are no leaks.
  - d. Perform a wash-down of the composite mesh-pads in accordance with manufacturer recommendations.  
(9VAC5-60-100 Subpart N and 40 CFR 63.342(f)(3)(i)(B))
73. Chromium Electroplating Equipment Requirements - The permittee shall monitor, once per calendar day when the tank is in operation, the pressure drop across the composite mesh-pad.  
(9VAC5-60-100 Subpart N and 40 CFR 63.343(c)(1)(ii))
74. Chromium Electroplating Equipment Requirements - Visible emissions observations shall be performed on the chromium electroplating process exhaust, CP-1, at least once each week during periods of normal unit operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed during these weekly observations, or at any other time, visible emissions evaluations in accordance with 40 CFR 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum of six (6) minutes. If any of the observations exceed twenty percent (20%), the VEE shall be conducted for a total of sixty (60) minutes. A Method 9 evaluation shall not be required if the visible emissions condition is corrected as expeditiously as practicable such that no visible emissions are present; the emissions unit is operating at normal conditions; and the cause and corrective measures taken are recorded. A record of each visible emissions observation shall be maintained, including, at a minimum, the date, time, name of the emission unit, the applicable visible emissions requirement, the results of the observation, and the name of the observer.  
(9VAC5-50-20 and 9VAC5-80-110 K)

## **Recordkeeping**

75. Chromium Electroplating Equipment Requirements - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Southwest Regional Office. These records shall include, but are not limited to:
- a. Inspections of work practice standards as required in Condition 72 to include the date of each inspection, name of inspector, identification of the device inspected, a brief

description of the device during inspection, and any actions taken to correct deficiencies found during the inspection.

- b. All maintenance performed on the process, air pollution control system, and monitoring equipment.
- c. All malfunctions of the process, air pollution control device, and monitoring equipment, to include the occurrence, duration, and cause of the malfunction.
- d. Actions taken during periods of malfunction to minimize emissions.
- e. Other records necessary to demonstrate consistency with the provisions of the operation and maintenance plan.
- f. Test reports documenting the results of performance tests conducted on the affected source.
- g. Measurements necessary to determine the conditions during performance tests.
- h. Monitoring data as required in Condition 73 above to include the control system identification, monitored parameters, and the time and date when the parameter was monitored.
- i. Specific identification, including date and time of commencement and completion, of each period of excess emissions as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment.
- j. Specific identification, including date and time of commencement and completion, of each period of excess emissions as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment.
- k. Total process operating time for the chromium electroplating tank, CP-1.
- l. Documentation of all notifications and reports.
- m. Operation and Maintenance plan. The operation and maintenance plan shall be made available for inspection, upon request, by the DEQ or Administrator for the life of the affected source or until the source is no longer subject to the provisions of 40 CFR Part 63, Subpart N. Previous versions of the plan shall be kept on record for a period of at least 5 years.
- n. Visible emissions observations and evaluations.

Unless otherwise required, these records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-60-20D, 9VAC5-60-100 Subpart N, 40 CFR 63.342(f)(3)(v) and 40 CFR 63.346)

### **Testing**

76. Chromium Electroplating Equipment Requirements - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the DEQ, test ports shall be provided at the appropriate locations. (9VAC5-80-110 and 9VAC5-50-30)
77. Chromium Electroplating Equipment Requirements - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ. (9VAC5-80-110)

### **Reporting**

78. The permittee shall report by phone to the Southwest Regional Office, of actions taken during periods of malfunction that are inconsistent with the procedures specified in the operation and maintenance plan within two working days after commencing such actions. The report shall be followed by a letter within seven working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Southwest Regional Office. (9VAC5-60-20D, 9VAC5-60-100 Subpart N and 40 CFR 63.342(f)(3)(iv))
79. Chromium Electroplating Equipment Requirements - The permittee shall submit to the Southwest Regional Office, an Ongoing Compliance Status Report in accordance with 40 CFR 63.347(g). Reports covering the periods from January 1 through June 30 should be postmarked or delivered by September 1 following the reporting period. Reports covering the periods from July 1 through December 30 should be postmarked or delivered by March 1 following the reporting period. Each report shall include, at a minimum:
- a. The company name and address of the affected source;
  - b. Identification of the operating parameter that is monitored for compliance determination;
  - c. The relevant emission limitation for the affected source and the operating parameter value or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status;
  - d. The beginning and ending dates of the reporting period;
  - e. A description of the type of process performed in the affected source;
  - f. The total operating time of the affected source during the reporting period;

- g. The actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis, if the affected source is a hard chromium electroplating tank and the owner or operator is limiting the maximum cumulative rectifier capacity;
- h. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emission during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- i. A certification by a responsible official that the work practice standards were followed in accordance with the operation and maintenance plan for the source;
- j. If the operation and maintenance plan was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report required by the operation and maintenance plan, documenting why the operation and maintenance plan was not followed;
- k. A description of any changes in monitoring, processes, or controls since the last reporting period;
- l. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken during a malfunction to minimize emissions, including actions taken to correct a malfunction.
- m. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and
- n. The date of the report.

Copies of each semiannual compliance report shall be submitted to EPA at the following address:

Office of Air Enforcement and Compliance Assistance, 3AP20  
EPA Region III  
1650 Arch Street  
Philadelphia, PA 19103  
(9VAC5-60-20D, 9VAC5-60-100 Subpart N and 40 CFR 63.347(g)(3))

## Emergency Generator Requirements – EG-1

### Limitations

80. Emergency Generator Requirements – In order for the engine to be considered an emergency stationary RICE, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described below, is prohibited. The permittee shall operate the emergency generator according to the requirements below:

- a. There is no time limit on the use of an emergency stationary RICE in emergency situations.
- b. The emergency stationary RICE may be operated as described by this condition for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph (c) counts as part of the 100 hours per calendar year.

Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

- c. Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(9VAC5-80-110 and 40 CFR 63.6640(f))

81. Emergency Generator Requirements - The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

(9VAC5-80-110 and 40 CFR 63.6625(h))

82. Emergency Generator Requirements - The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2c of 40 CFR 63, Subpart ZZZZ. The oil analysis must be performed at the same frequency

specified for changing the oil in Table 2c. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

(9VAC5-80-110 and 40 CFR 63.6625(i))

83. Emergency Generator Requirements - Visible emissions from the engine shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.  
(9VAC5-80-110 and 9VAC5-50-80)
84. Emergency Generator Requirements - The permittee shall comply with the following work practices for the emergency engine:
  - a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and,
  - c. Inspect all hoses and belts every 500 hours of operation, or annually, whichever comes first, and replace as necessary.

(9VAC5-80-110, 40 CFR 63.6602, and Table 2c of 40 CFR 63, Subpart ZZZZ)
85. Emergency Generator Requirements - The permittee shall operate and maintain the engine and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions. These measures shall include, but not be limited to:
  - a. Operate and maintain of the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or,
  - b. Develop and follow an alternative maintenance plan that must provide, to the extent practicable, for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

(9VAC5-80-110, 40 CFR 63.6605, 63.6625(e), 63.6640, & 63.6655 and Table 6 of 40 CFR 63, Subpart ZZZZ)



## Monitoring

86. Emergency Generator Requirements - The permittee shall install a non-resettable hour meter on emergency engine Ref. EG-1, if one is not already installed.  
(9VAC5-80-110 and 40 CFR 63.6625(f))
87. Emergency Generator Requirements - The permittee shall:
- a. Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or,
  - b. Develop and follow an alternative maintenance plan that must provide, to the extent practicable, for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.  
(9VAC5-80-110 and 40 CFR 63.6655 and Table 6 of 40 CFR 63, Subpart ZZZZ)

## Recordkeeping/Reporting

88. Emergency Generator Requirements - The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Southwest Regional Office. These records and reporting shall include, but are not limited to:
- a. Records of the occurrence and duration of each malfunction of operation or of monitoring equipment, and the corrective actions taken.
  - b. Records of all required maintenance performed on the monitoring equipment.
  - c. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
  - d. Records of maintenance conducted and a copy of the maintenance plan.
  - e. Records of hours of operation of the engine, and hours spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.
  - f. Report all deviations from operating limits as part of the semiannual monitoring report of Condition 97 of this permit.  
(9VAC5-80-110 40 CFR 63.6640(b), 40 CFR 63.6650(f), and 40 CFR 63.6655)

## Testing

89. Emergency Generator Requirements - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the DEQ, test ports shall be provided at the appropriate locations.  
(9VAC5-80-110 and 9VAC5-50-30)
90. Emergency Generator Requirements - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.  
(9VAC5-80-110)

## Insignificant Emission Units

91. Insignificant Emission Units - The following emission units at the facility are identified in the application as insignificant emission units under 9VAC5-80-720:

<b>Emission Unit No.</b>	<b>Emission Unit Description</b>	<b>Citation</b>	<b>Pollutant(s) Emitted (9VAC5-80-720B)</b>	<b>Rated Capacity (9VAC5-80-720C)</b>
B-4	Precision Low Pressure Boiler, natural gas-fired	5-80-720 C.2	----	0.84 MMBtu/hr heat input
T-7	Distillate oil bulk storage tank	5-80-720 B.2.	VOC	8,000 gallons storage capacity
T-9	Powdered clay bulk storage tank	5-80-720 B.1.	Particulate Matter	3,000 cubic feet storage capacity
FAB	Fabrication and Hand lay-up area	5-80-720 B.2.	VOC and HAP	0.5 ton/hr, output
LBSR	Laboratory and burn room	5-80-720 A.28.	----	0.5 lbs/hr, output
SF-1	Vitap hole drilling machine	5-80-720 B.1.	PM10	100 holes/min

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9VAC5-80-110.  
(9VAC5-80-110)

## Permit Shield & Inapplicable Requirements

92. Permit Shield & Inapplicable Requirements - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

<b>Citation</b>	<b>Title of Citation</b>	<b>Description of Applicability</b>
40 CFR Part 60, Subpart VVV and 9VAC5-50-410	Standards of Performance for Polymeric Coating of Supporting Substrates Facilities	Each coating operation and any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates.
40 CFR Part 60, Subpart Kb and 9VAC5-50-410	Standards of Performance for Volatile Organic Liquid Storage Vessels	Each storage vessel with a capacity greater than or equal to 40 cubic meters used to store volatile organic liquids for which construction, reconstruction, or modification is commenced after July 23, 1984.
40 CFR Part 60, Subpart IIII and 9VAC5-50-410	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Applies to owners and operators of stationary CI ICE that commence construction after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006, and are not fire pump engines.
40 CFR Part 63, Subpart T and 9VAC5-60-100	National Emission Standards for Hazardous Air Pollutants for Source Categories, Halogenated Solvent Cleaning	Each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for

any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9VAC5-80-110 and 9VAC5-80-140)

## General Conditions

93. General Conditions - Federal Enforceability - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.  
(9VAC5-80-110)

94. General Conditions - Permit Expiration

- a. This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9VAC5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
- b. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- c. If an applicant submits a timely and complete application for an initial permit or renewal under 9VAC5-80-80 F, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9VAC5 Chapter 80, until the Board takes final action on the application under 9VAC5-80-150.
- d. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9VAC5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9VAC5 Chapter 80.
- e. If an applicant submits a timely and complete application under section 9VAC5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9VAC5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- f. The protection under subsections F 1 and F 5 (ii) of section 9VAC5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section

9VAC5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9VAC5-80-80, 9VAC5-80-110 and 9VAC5-80-170)

95. General Conditions - Recordkeeping and Reporting - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

- a. The date, place as defined in the permit, and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

(9VAC5-80-110)

96. General Conditions - Recordkeeping and Reporting - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9VAC5-80-110)

97. General Conditions - Recordkeeping and Reporting - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31; and
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
  - i. Exceedances of emissions limitations or operational restrictions;
  - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring or periodic monitoring, or

Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,

iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semiannual reporting period."

(9VAC5-80-110)

98. General Conditions - Annual Compliance Certification - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9VAC5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31;
- b. The identification of each term or condition of the permit that is the basis of the certification;
- c. The compliance status;
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9VAC5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;
- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3\_APD\_Permits@epa.gov

(9VAC5-80-110)

99. General Conditions - Permit Deviation Reporting - The permittee shall notify the Southwest Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semiannual compliance monitoring report pursuant to Condition 97 of this permit.  
(9VAC5-80-110 F. 2)
100. General Conditions - Failure/Malfunction Reporting - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall no later than four daytime business hours after the malfunction is discovered, notify the Southwest Regional Office such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Southwest Regional Office.  
(9VAC5-80-110 and 9VAC5-20-180)
101. General Conditions - Severability - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.  
(9VAC5-80-110)
102. General Conditions - Duty to Comply - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.  
(9VAC5-80-110)
103. General Conditions - Need to Halt or Reduce Activity not a Defense - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.  
(9VAC5-80-110)
104. General Conditions - Permit Modification - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9VAC5-80-50, 9VAC5-80-1100, 9VAC5-80-1605, or 9VAC5-80-2000 and may require a

permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.  
(9VAC80-110, 9VAC5-80-190, and 9VAC5-80-260)

105. General Conditions - Property Rights - The permit does not convey any property rights of any sort, or any exclusive privilege.  
(9VAC5-80-110)
106. General Conditions - Duty to Submit Information - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.  
(9VAC5-80-110)
107. General Conditions - Duty to Submit Information - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9VAC5-80-80 G.  
(9VAC5-80-110)
108. General Conditions - Duty to Pay Permit Fees - The owner of any source for which a permit was issued under 9VAC5-80-50 through 9VAC5-80-300 shall pay annual emissions fees, as applicable, consistent with the requirements of 9VAC5-80-310 through 9VAC5-80-350 and annual maintenance fees, as applicable, consistent with the requirements of 9VAC5-80-2310 through 9VAC5-80-2350.  
(9VAC5-80-110, 9VAC5-80-310 et seq., and 9VAC5-80-2310 et seq.)
109. General Conditions - Fugitive Dust Emission Standards - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
  - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
  - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;



- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
  - d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
  - e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.  
(9VAC5-80-110 and 9VAC5-50-90)
110. General Conditions - Startup, Shutdown, and Malfunction - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.  
(9VAC5-80-110 and 9VAC5-50-20 E)
111. General Conditions - Alternative Operating Scenarios - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9VAC5 Chapter 80, Article 1.  
(9VAC5-80-110)
112. General Conditions - Inspection and Entry Requirements - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
  - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

- d. Sample or monitor at reasonable times' substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9VAC5-80-110)

113. General Conditions - Reopening for Cause - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9VAC5-80-80 F. The conditions for reopening a permit are as follows:

- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9VAC5-80-110 D.

(9VAC5-80-110)

114. General Conditions - Permit Availability - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9VAC5-80-110 and 9VAC5-80-150)

115. General Conditions - Transfer of Permits

- a. No person shall transfer a permit from one location to another, unless authorized under 9VAC5-80-130, or from one piece of equipment to another.
- b. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9VAC5-80-200.
- c. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9VAC5-80-200.

(9VAC5-80-110 and 9VAC5-80-160)

116. General Conditions - Permit Revocation or Termination for Cause - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9VAC5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.  
(9VAC5-80-110, 9VAC5-80-190 C, and 9VAC5-80-260)
117. General Conditions - Duty to Supplement or Correct Application - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.  
(9VAC5-80-110 and 9VAC5-80-80 E)
118. General Conditions - Stratospheric Ozone Protection - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.  
(9VAC5-80-110 and 40 CFR Part 82)
119. General Conditions - Asbestos Requirements - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).  
(9VAC5-60-70 and 9VAC5-80-110)
120. General Conditions - Accidental Release Prevention - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.  
(9VAC5-80-110 and 40 CFR Part 68)
121. General Conditions - Changes to Permits for Emissions Trading - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.  
(9VAC5-80-110)

122. General Conditions - Emissions Trading - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
- a. All terms and conditions required under 9VAC5-80-110, except subsection N, shall be included to determine compliance.
  - b. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
  - c. The owner shall meet all applicable requirements including the requirements of 9VAC5-80-50 through 9VAC5-80-300.  
(9VAC5-80-110)